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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

2015 SEP 11 PM 1:42

U.S. DISTRICT COURT  
EASTERN DISTRICT  
OF NEW YORK

**CV 15 - 5322**  
COMPLAINT

Jacob Feldman

NAME OF PLAINTIFF(S)

v.

*Jury Trial Demanded*

Aish Hatareh International, INC.

**COGAN, J.**

NAME OF DEFENDANT(S)

This action is brought for discrimination in employment pursuant to (check only those that apply):

\_\_\_\_\_ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (amended in 1972, 1978 and by the Civil Rights Act of 1991, Pub. L. No. 102-166) (race, color, gender, religion, national origin).

*NOTE: In order to bring a suit in federal district court under Title VII, you must first obtain a right to sue letter from the Equal Employment Opportunity Commission.*

✓ \_\_\_\_\_ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 - 634 (amended in 1984, 1990, and by the Age Discrimination in Employment Amendments of 1986, Pub. L. No. 92-592, the Civil Rights Act of 1991, Pub. L. No. 102-166).

*NOTE: In order to bring a suit in federal district court under the Age Discrimination in Employment Act, you must first file charges with the Equal Employment Opportunity Commission.*

\_\_\_\_\_ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 - 12117 (amended by the ADA Amendments Act of 2008, Pub. L. No. 110-325 and the Civil Rights Act of 1991, Pub. L. No. 102-166).

*NOTE: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a right to sue letter from the Equal Employment Opportunity Commission.*

Jurisdiction is specifically conferred upon this United States District Court by the aforementioned statutes, as well as 28 U.S.C. §§ 1331, 1343. Jurisdiction may also be appropriate under 42 U.S.C. §§ 1981, 1983 and 1985(3), as amended by the Civil Rights Act of 1991, Pub. L. No. 102-166, and any related claims under New York law.

1. Plaintiff resides at:

1743 Ocean Ave  
Street Address

Kings, NY, 11230, 646 261-0200  
County State Zip Code Telephone Number

2. Defendant(s) resides at, or its business is located at:

505 8<sup>th</sup> Ave Suite 601  
Street Address

New York, New York, NY, 10018  
County City State Zip Code

3. The address at which I sought employment or was employed by the defendant(s) is:

150 West 46<sup>th</sup> St 3<sup>rd</sup> Fl. NY NY 10036  
Street Address

New York, New York, NY, 10036  
County City State Zip Code

4. The discriminatory conduct of which I complain in this action includes  
(check only those that apply).

☐ Failure to hire.  
☒ Termination of my employment.  
☐ Failure to promote.  
☐ Failure to accommodate my disability.  
☐ Unequal terms and conditions of my employment.  
☒ Retaliation  
☐ Other acts (*specify*): \_\_\_\_\_

**NOTE:** *Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court.*

5. It is my best recollection that the alleged discriminatory acts occurred on:

Date(s) 10/13/2013

6. I believe that the defendant(s) (check one)

✓ is still committing these acts against me.

       is not still committing these acts against me.

7. Defendant(s) discriminated against me based on my:  
(check only those that apply and state the basis for discrimination, for example,  
what is your religion, if religious discrimination is alleged)

[ ] race \_\_\_\_\_ [ ] color \_\_\_\_\_

[ ] gender/sex \_\_\_\_\_ [ ] religion \_\_\_\_\_

[ ] national origin \_\_\_\_\_

[ ] disability \_\_\_\_\_

☒ age. If age is checked, answer the following:

I was born in 1969. At the time(s) defendant(s) discriminated against me,  
Year

I was ☒ more ☐ less than 40 years old. (check one).

**NOTE:** *Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court.*

8. The facts of my case are as follows:

On or about Oct 13, 2013 Aish Int'l INC.  
Terminated my employment without notice and without  
Severance/Damages. I was replaced by a person half  
my age earning half of my salary.  
Bemo that this case is over 300 days the EEOC  
cant take the case - so I must take it directly with the  
Court.

(Attach additional sheets as necessary)

**NOTE:** *As additional support for your claim, you may attach to this complaint a copy of the charge filed with the Equal Employment Opportunity Commission, the New York State Division of Human Rights, or the New York City Commission on Human Rights.*

9. It is my best recollection that I filed a charge with the New York State Division of Human Rights or the New York City Commission on Human Rights regarding defendant's alleged discriminatory conduct on: N.A.  
Date

10. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission regarding defendant's alleged discriminatory conduct on: N.A.  
Date

**Only litigants alleging age discrimination must answer Question #11.**

11. Since filing my charge of age discrimination with the Equal Employment Opportunity

Commission regarding defendant's alleged discriminatory conduct (*check one*):

N.A. 60 days or more have elapsed.

N.A. less than 60 days have elapsed.

12. The Equal Employment Opportunity Commission (*check one*):

✓ has not issued a Right to Sue letter.

       has issued a Right to Sue letter, which I  
received on \_\_\_\_\_  
Date

**NOTE:** Attach a copy of the Right to Sue Letter from the Equal Employment Opportunity Commission to this complaint.

WHEREFORE, plaintiff prays that the Court grant such relief as may be appropriate, including injunctive orders, damages, pre-judgment interest, costs, and attorney's fees.

②

  
PLAINTIFF'S SIGNATURE

Dated: Sept. 10, 2015

1743 Ocean Ave  
Address  
Brooklyn NY 11230  
646 261-0200  
Phone Number